

9/30/22  
By  
Clark, U. S. District Court  
Western District of Texas  
Deputy

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

MICHELLE ARES,  
Plaintiff,

v.

SCHNEIDER ELECTRIC USA,  
Defendant.

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EP-19-CV-00283-FM

**JURY VERDICT FORM**

**HOSTILE WORK ENVIRONMENT (VICARIOUS LIABILITY)**

**QUESTION NO. 1**

Was Jesus Estrada the supervisor of Plaintiff Michelle Ares?

Answer "Yes" or "No."

No

If you answered "No" to Question No. 1, then do not answer Questions No. 2, 3, 4, 5, and 6.

**QUESTION NO. 2**

Was Plaintiff Michelle Ares sexually harassed by Jesus Estrada?

Answer "Yes" or "No."

**QUESTION NO. 3**

Was Plaintiff Michelle Ares sexually harassed by others in front of Jesus Estrada?

Answer "Yes" or "No."

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**QUESTION NO. 4**

Did Jesus Estrada report the sexual harassment?

Answer "Yes" or "No."

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**QUESTION NO. 5**

Has Defendant Schneider Electric proved that it exercised reasonable care to prevent and promptly correct the harassing behavior?

Answer "Yes" or "No."

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**QUESTION NO. 6**

Has Defendant Schneider Electric proved that Plaintiff Michelle Ares unreasonably failed to take advantage of or use any preventive or corrective opportunities provided by Defendant Schneider Electric or to avoid harm otherwise?

Answer "Yes" or "No."

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**HOSTILE WORK ENVIRONMENT (NEGLIGENCE)**

**QUESTION NO. 7**

Did Plaintiff Michelle Ares's co-workers sexually harass her?

Answer "Yes" or "No."

YES

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If you answered "Yes" to Question No. 7, then answer Question No. 8.

**QUESTION NO. 8**

Did Defendant Schneider Electric know, or in the exercise of reasonable care should have known, or was it communicated to a Schneider Electric or Aerotek employee with authority to receive, address, or report the complaint, that Michelle Ares was being sexually harassed?

Answer "Yes" or "No."

YES

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If you answered "Yes" to Question No. 8, then answer Question No. 9.

**QUESTION NO. 9**

Did Defendant Schneider Electric fail to take prompt remedial action?

Answer "Yes" or "No."

YES

**DAMAGES**

**QUESTION NO. 10**

What sum of money, if paid now in cash, would fairly and reasonably compensate Plaintiff Michelle Ares for the damages, if any, you have found Defendant Schneider Electric caused Plaintiff Michelle Ares? Answer in dollars and cents for the following items and none other:

1. Past pain and suffering, inconvenience, mental anguish, and loss of enjoyment of life.

\$ 250,000.00

2. Future pain and suffering, inconvenience, mental anguish, and loss of enjoyment of life.

\$ 250,000.00

**CERTIFICATE**

We, the jury, have answered the above and foregoing questions as herein indicated, and herewith return same into court as our verdict.

PRESIDING JUROR, on behalf of a unanimous jury

Printed Name of Presiding Juror